

**STATE OF NEW MEXICO**  
**BEFORE THE SECRETARY OF THE ENVIRONMENT**

**IN THE MATTER OF**  
**HEARING DETERMINATION REQUEST FOR**  
**THE WASTE ISOLATION PILOT PLANT (WIPP)**  
**DISCHARGE PERMIT RENEWAL AND**  
**MODIFICATION APPLICATION FOR DP-831**

**DOCKET NO. GWQB 21-19**

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**REQUEST FOR ORAL ARGUMENT ON THE**  
**HEARING OFFICER'S REPORT ON BEHALF OF**  
**CONCERNED CITIZENS FOR NUCLEAR SAFETY ("CCNS")**

Pursuant to the New Mexico Environment Department's Permit Procedures, § 20.1.4.500.C(3) NMAC, Concerned Citizens for Nuclear Safety ("CCNS"), a party herein, respectfully requests that the Secretary hear oral argument on the Hearing Officer's Report, filed on November 19, 2021.

CCNS believes that oral argument will allow the Secretary to investigate why there are such divergent views among the parties about the adequacies and insufficiencies of the Hearing Officer's Report, how they contribute to a lawful or unlawful outcome, and whether future proceedings under the New Mexico Water Quality Act, NMSA 1978, §§ 74-6-1 through 74-6-17, could be made just for all parties and more efficient.

Respectfully submitted,

/s/ Joni Arends

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Dated: December 6, 2021

## Certificate of Service

I hereby certify that on December 6, 2021 a copy of the *Request For Oral Argument on the Hearing Officer's Report on Behalf of Concerned Citizens for Nuclear Safety ("CCNS")* were emailed to the persons listed below:

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